West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-01900034-2011**
Application Received: **August 31, 2010**
Plant Identification Number: **03-054-019-00034**
Permittee: **Georgia-Pacific Wood Products LLC**
Mailing Address: **79 North Pax Avenue, Mt. Hope, WV 25880**

Physical Location:	Mt. Hope, Fayette County, West Virginia
UTM Coordinates:	483.5 km Easting • 4,194.5 km Northing • Zone 17
Directions:	From I-77/I-64, take the North Beckley exit onto Highway 19. Exit at Mt. Hope and turn left onto Pax Avenue. Take the first right into the plant entrance.

Facility Description

Georgia-Pacific Wood Products LLC's Mt. Hope OSB Mill is a reconstituted wood products facility covered by Standard Industrial Classification (SIC) Code 2493. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of the following: Wellons Energy/Dryer System, auxiliary gas burner, pressing operations, former area, long mat trim system, two (2) paint booths, finishing area, sander dust fuel system, dry fuel system, sanding area, screen fines, storage tanks, and the screening building dedust system.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	**Potential Emissions** [1]	**2009 Actual Emissions** [1]
Carbon Monoxide (CO)	324.7 [5]	45.0
Nitrogen Oxides (NO_x)	266.4	62.2
Particulate Matter (PM_{10}) [3]	232.55 + 10.80 = 243.35 [6]	52.83 + 5.19 = 58.02
Total Particulate Matter (TSP) [3]	182.69 + 32.10 = 214.79	34.41 + 17.53 = 51.94
Sulfur Dioxide (SO_2)	21.3	0.25
Volatile Organic Compounds (VOC)	165.7 [7]	54.8
Hazardous Air Pollutants	**Potential Emissions** [1, 2]	**2009 Actual Emissions** [1]
Acetaldehyde	14.60	5.54
Formaldehyde	25.75	9.11
Hydrogen Chloride	11.56	3.76
Methanol	46.41	13.28
Aggregate HAPs [4]	109.61	40.89

[1] *Potential and actual emissions were provided in Appendix A, Emissions Summary, of the renewal application.*

[2] *There are ninety nine (99) speciated HAPs listed in Appendix A of the renewal application. Any HAP in that list with a PTE greater than 10 tpy is listed in this Emissions Summary table.*

[3] *The algebraic summations given above are that of Process Sources and Fugitive Sources, in that order, as transcribed from the renewal application.*

[4] *The aggregate potential and actual HAPs values in the table above were calculated by this writer using the electronic Microsoft® Excel® spreadsheet file (Emissions_Summary.xls) provided in the application, and includes all HAPs listed in the application (i.e., organic/inorganic and trace metal HAPs).*

[5] *The PTE for CO was 290.3 tpy after the changes associated with the significant modification (SM01) of the current permit R30-01900034-2006. This 290.3 tpy value had been computed using data available from the 2006 operating permit Final Fact Sheet (which restates the data provided in the 2006 renewal application) and PTE changes provided by the permittee in the SM01 application. In this renewal application, however, the permittee has increased the PTE to account for sources that had not been previously included in the facility's PTE. According to technical correspondence[1], the "permit limits for CO on the Wellons is 210.2 tpy and on the [Board] press it is 94.2 tpy for a total of 304.4 tpy. This does not include CO from our Auxiliary Thermal Oil Heater (19.3 tpy) or our RICE units (1.0 tpy)."*

[6] *The PTE for PM_{10} was 189.7 tpy after the changes associated with the significant modification (SM01) of the current permit R30-01900034-2006. This 189.7 tpy value had been computed using data available from the 2006 operating permit Final Fact Sheet (which restates the data provided in the 2006 renewal application) and PTE changes provided by the permittee in the SM01 application. In this renewal application, however, the permittee has increased the PTE to account for including condensable particulate with the filterable-only fraction, which according to technical correspondence[1], has been the basis for particulate PTE in the past.*

[7] *The PTE for VOC was 61.3 tpy after the changes associated with the significant modification (SM01) of the current permit R30-01900034-2006. This 61.3 tpy value had been computed using data available from the 2006 operating permit Final Fact Sheet (which restates the data provided in the 2006 renewal application) and PTE changes provided by the permittee in the SM01 application. In this renewal application, however, the permittee has increased the PTE to account for sources that had not been previously included in the facility's PTE. According to technical correspondence[1], the "VOC value in the [R30-01900034-2006, SM01] Fact Sheet does not include emissions from the blenders or the log deicing system…or any of the pneumatic systems."*

[1] December 20, 2010 email to this writer from Mr. Kim Casto, Environmental Manager for the permittee.

Title V Program Applicability Basis

This facility has the potential to emit 324.7 tpy of CO; 266.4 tpy of NOx; 243.35 tpy of PM10; 214.79 tpy of TSP; 165.7 tpy of VOC; 14.60 tpy of acetaldehyde; 25.75 tpy of formaldehyde; 11.56 tpy of hydrogen chloride; 46.41 tpy of methanol; and 125.04 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Georgia-Pacific Wood Products LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR7	PM from Manufacturing Processes
	45CSR10	Prevent and Control Emissions of SO_2
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction permits
	45CSR16	Standards of performance pursuant to 40 C.F.R. 60
	WV Code § 22-5-4(a)(14)-(15)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. 60 Subpart Dc	NSPS for small industrial-commercial-institutional steam generators
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart DDDD	Plywood and Composite Wood Products NESHAPs-MACT
	40 C.F.R. 63 Subpart ZZZZ	RICE NESHAPs-MACT
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM)
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
R13-1622H	December 14, 2009	
R13-2261A	February 23, 2000	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

I. **45CSR30 – *Requirements for Operating Permits***.

a. **Compliance Requirements**. In keeping with 45CSR§30-5.3.a., the operating permit was reviewed to ensure that each limitation or standard is accompanied by an appropriate permit condition (or conditions) used to demonstrate compliance with the limit or standard. The following issues will therefore be addressed:

i. **Condition 7.1.1.** sets hourly particulate matter mass limits for multiple emission sources. In particular, the Silos 8950 and 9600 both have hourly PM limits. This writer examined the current operating permit to ascertain the method for compliance demonstration. After not readily finding one within the permit, this writer asked the permittee what method is used to demonstrate compliance with the mass rate limits. The permittee responded in technical correspondence[1] that the emission limits in condition 7.1.1. for Silos 8950 and 9600 are actually for the pneumatic transfer systems which collect the material from other pneumatic systems within the facility for deposition of the collected material into the silos. As such, as with the other pneumatic systems at the facility, compliance is (and will be) demonstrated by conducting visible emissions observations of the exhausts from these pneumatic systems. The compliance method is found in current condition 3.2.1. To clarify this and direct the reader to the compliance demonstration method, a reference condition has been written as 7.2.4.

ii. **Condition 7.1.3.** requires no visible emissions from Silos 8950 and 9600. It may be reasonably expected to find a Method 22 monitoring requirement in permit subsection 7.2., but there is none. There is, however, facility-wide condition 3.2.1. that requires weekly visible emission monitoring employing Method 22 (and Method 9 if necessary). So while the necessary monitoring to demonstrate compliance with 7.1.3. is contained in the permit, it is not readily apparent. Therefore, as described above for condition 7.1.1., likewise for condition 7.1.3. a new reference condition 7.2.4. has been created to refer to facility-wide monitoring condition 3.2.1.

b. **Compliance Plan for Unpermitted Sources & Changes to Emission Units Table**. Table A below specifies emission sources that the permittee included in the Emission Units Table (Attachment D) of the renewal application which are neither contained in the current Title V

[1] October 12, 2010 email to this writer from Mr. Cliff Bowling, Sr. Environmental Engineer for the permittee.

permit, nor any underlying permit (R13-2261A, R13-1622H), and are required to be included in a Compliance Plan. Specifics regarding each source are given following Table A.

Table A

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
6000	6000	Blenders	1995	46.5 OD tons/hr	None
Fugitive	Log Deicing	Log Deicing/Conditioning	1995	90 tons/hr	None
RICE-1	RICE-1	Firewater Pump Engine	1995	255 hp	None

Blenders (6000). The potential emissions of VOC and Methanol from the Blenders (as listed in application Attachment E) are given below:

Pollutant	lb/hr	tons/yr
VOC	9.23	35.0
Methanol	3.64	13.8

Emissions of both pollutants trigger a "Modification" under 45CSR§§13-2.17.a. and 2.17.b., respectively. Further, the potential VOC emissions of 9.23 lb/hr and 35.0 ton/yr both exceed the thresholds of 2 lb/hr or 5 ton/yr that were in effect for regulated air pollutants other than HAPs or TAPs when the facility was constructed in 1995. This was determined by examining 45CSR13 that was filed and became effective on April 27, 1994. Therefore, the Blenders are not "grandfathered". Further, this writer did not find a Permit Determination in the DAQ files regarding the Blenders. This writer asked the permittee if they have submitted a permit determination, permit modification application, or any other documentation to DAQ with regard to permitting the Blenders. The permittee responded in technical correspondence[1] that the "Blenders have always been listed as process equipment in the applications submitted for the facility. However, it wasn't until the previous Title V application was submitted in 2005 that emission estimates were provided based on updated AP-42 (and/or NCASI) emissions data." The application states that a PM limit of 32.7 lb/hr (from 45CSR§7-4.1.) is applicable to the Blenders, and to demonstrate compliance current condition 7.2.3. is cited. Currently, condition 7.2.3. requires VE's for the Bark Hog (2230), the Log Debarkers (1050), and the Log Flakers (2000), while nothing is specified regarding the Blenders. The language "Blenders (6000)" has been added among the emission sources already listed in condition 7.2.3. Nevertheless, the permittee needs to have the Blenders permitted under 45CSR13 since the emissions of VOC and HAPs trigger a modification.

45CSR7 – *To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations*

As mentioned above, the application states that the Blenders are subject to a PM mass rate limit of 32.7 lb/hr, which comes from 45CSR§7-4.1. This limit is correct, and is based on the determination that the Blenders are a Type 'a' source operation (as defined at 45CSR§7-2.39.a.) since the wood flakes undergo physical change in the Blenders, but no chemical change. The application states that the flakes are mixed with the resin and wax within the Blenders prior to being formed into a mat. The Blenders (6000) and the 32.7 lb/hr limit have been added as the last row in the table in permit condition 7.1.1. The authority of 45CSR7-4.1. is already cited under the condition.

[1] September 16, 2010 email to this writer from Mr. Kim Casto, Environmental Manager for the permittee.

Log Deicing/Conditioning. According to application Attachment E for this source, the emissions are considered fugitive, which are given in the table below.

Pollutant	lb/hr	tons/yr
VOC	5.14	22.49
Acetaldehyde	0.32	1.42
Methanol	0.51	2.22

The potential emissions given in the application are less than the modification thresholds under 45CSR§§13-2.17.a. and 2.17.b. However, since the source has not been reviewed under NSR, it should be included with the application required by the compliance plan discussed below.

RICE-1 Firewater Pump Engine. The following RICE were included in the renewal application.

EU ID	Description	Installation Date	HP	Fuel	Permittee's Suggested Operating Schedule
RICE-1	Firewater Pump Engine	4/01/1995	255	Diesel	500 hr/yr
RICE-2	Thermal Oil Pump Engine	4/01/1995	41	Natural Gas	500 hr/yr
RICE-3 through RICE-8	Dryer Drum Engines	4/01/1995	18	Gasoline	500 hr/yr

The emissions data provided in the application for all of these engines are based on a maximum operating schedule of 500 hr/yr. RICE-2 through RICE-8 will not be included in the Compliance Plan since their potential emissions based upon 8,760 hours per year do not meet the modification criteria in 45CSR§13-2.17.a. (regardless of the USEPA guidance memorandum dated September 6, 1995, which is discussed in the Response to Comment No. 1 in the Statement of Basis).

RICE-1 will be included in the Compliance Plan. An observation in application Attachment E regarding RICE-1 is that its potential emission rate of NO_x is 7.91 lb/hr. Since 8,760 hr/yr must be used for PTE calculations, the annual PTE would be 34.6 ton/yr. These rates meet the criteria at 45CSR§13-2.17.a. for a modification. This engine has not been reviewed under NSR procedures. Therefore, refer to the compliance plan discussed below. Also refer to the Response to Comment No. 1 (Statement of Basis) for an explanation of why PTEs for RICE-1 must be estimated based upon 8,760 hours per year, and not assumed to be 500 hours per year following U.S. EPA guidance memorandum for emergency generators.

Compliance Plan. Permit condition 3.6.1. has been created to set forth a compliance plan to have the preceding sources (in Table A above) permitted according to the applicable procedures in 45CSR13, and to also modify this operating permit to incorporate NSR permit requirements that may precipitate.

II. ***40 C.F.R. 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines***. All of the RICE-1 through RICE-8 meet the criteria at §63.6590(a)(1)(ii); therefore, the RICE are considered *Existing stationary RICE*. None of the RICE meet any of the criteria under §63.6590(b) for *Stationary RICE subject to limited requirements*. Similarly, none of the RICE meet any of the criteria under §63.6590(c) for *Stationary RICE subject to Regulations under 40 CFR Part 60*. Table B below primarily sets out the applicable sections from Subpart ZZZZ and describes how the requirements are applied to the permittee's sources. However, there are some rule sections mentioned below that do not have a corresponding permit condition. While this may seem unnecessary, it is done in order to detail why the particular requirement is not applicable. Note that in the permit conditions language such as "this subpart" is replaced with "40 C.F.R. 63 Subpart ZZZZ" and other similar language changes and additions are made for clarity.

Table B

Rule Section	Cond.	Discussion
§63.6595(a)(1) *Affected Sources*	8.1.1.	Since RICE-1 is an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP, it must be in compliance with the applicable emission limitations and operating limitations no later than May 3, 2013. The language "of 40 C.F.R. 63 Subpart ZZZZ" was added to clarify what body of requirements the condition refers to. RICE-2 through RICE-8 are existing stationary SI RICE with a site rating less than 500 bhp located at a major source of HAP, they must be in compliance with the applicable emission limitations and operating limitations no later than October 19, 2013.
§63.6595(c) *Affected Sources*	None	This section does not apply since the notifications under §63.6645(a) do not apply.
§63.6602 *Existing stationary RICE ≤ 500-bhp at major source of HAPs*	8.1.2.	Since RICE-1 meets the applicability of this section, compliance must be demonstrated with applicable requirements from Table 2c of the rule. RICE-1 is an emergency stationary compression ignition (CI) RICE; therefore, the requirements in the first row of Table 2c are applicable. However, the language "and black start stationary CI RICE" is not applicable and has therefore been removed from the first sentence of the condition.
§63.6602 *Existing stationary RICE ≤ 500-bhp at major source of HAPs*	8.1.3.	RICE-2 through RICE-8 are emergency stationary spark ignition (SI) RICE, and therefore have some differing requirements in Table 2c compared to CI RICE.
§63.6605(a) *General requirement to comply with subpart*	None	This is a general requirement to comply with emission limitations and operating limitations in Subpart ZZZZ. Refer to the discussion below regarding §63.6650(d) detailing why the RICEs are not subject to any Subpart ZZZZ emission limitations and operating limitations.
§63.6605(b) *Good air pollution control practices*	8.1.4.	Inserted into the permit.
§63.6612(a) *Deadline for initial performance tests/compliance demonstrations for existing stationary RICE ≤ 500-bhp at major source of HAPs*	None	This requirement is for testing and compliance demonstration according to applicable requirements in Tables 4 and 5. Regardless of engine type (SI, CI, etc), all of the testing in Tables 4 and 5 applies to engines that must comply with numerical emission limits for CO and formaldehyde. However, the applicable requirements of §63.6602 (Table 2c, row 1) that apply to RICE-1 are not numerical limits for these pollutants. Rather, RICE-1 is subject to operating limitations specific to frequency of oil changes and inspections of the air cleaner and hoses. Thus, none of the requirements in Tables 4 and 5 are applicable to RICE-1, and so there is no permit

Rule Section	Cond.	Discussion
		condition for this rule section.
§63.6612(b) *Criteria for testing exemption*	None	Same rationale as above regarding §63.6612(a).
§63.6615 *Subsequent performance tests*	None	Same rationale as above regarding §63.6612(a).
§63.6620 *Performance tests and procedures*	None	Same rationale as above regarding §63.6612(a).
§§63.6625(e)(1) and (2) *Monitoring, installation, collection, operation, and maintenance requirements*	8.1.5.	The requirement in the first paragraph applies to all of the types of RICE listed in (e)(1) through (10). In the permittee's case, (e)(2) applies to RICE-1, while (e)(1) applies to RICE-2 through RICE-8. Therefore, two different citations of authority are written. One could make an argument for only citing §63.6625(e) since the numbered paragraphs (1) through (10) are essentially a list of sources subject to (e) rather than being specific requirements themselves. This writer chose to specify the number in the list for accuracy.
§§63.6630(a) and (b) *Initial compliance demonstration*	None	Same rationale as above regarding §63.6612(a).
§63.6630(c) *Initial compliance demonstration NOCS*	None	This section does not apply since the notifications under §63.6645(a) do not apply.
§63.6640(a) *Continuous compliance demonstration*	8.1.6.	This section states, "You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart." As demonstrated above, Table 2c contains an applicable requirement for the RICEs; thus, Table 6 was examined to determine if it contains any applicable requirements. Row 9 in Table 6 contains the applicable requirements for the RICEs.
§63.6640(b) *Continuous compliance demonstration*	8.5.1.	This is a deviation reporting requirement. The non-applicable language was removed. None of the RICE are equipped with catalysts; thus, this language is removed. There are no operating parameters that are reestablished; thus, the testing language is removed. Cross-referencing was added where appropriate.
§63.6645(a) *Notifications*	None	The requirements of §63.6645(a) and §63.6645(a)(1) do not apply to RICE-1 through RICE-8 since they meet one or more of the criteria given in the exemption under §63.6645(a)(5).
§63.6650(a) *Report submittal*	None	All of the requirements in Table 7 apply to non-emergency RICE. Since the permittee's RICE are emergency, the requirements of Table 7 and this rule section are **non-applicable**.
§63.6650(b) *Report submittal*	None	This section states, "…must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section." Since no requirement in Table 7 applies, there are no reports to be submitted according to (b)(1) through (b)(9). Therefore, this section is **non-applicable**.
§63.6650(c) *Report submittal*	None	This section is with regard to the Compliance report. However, the permittee is not subject to the Compliance report since none of the requirements in Table 7 apply. Therefore, this section is **non-applicable**.
§63.6650(d) *Report submittal*	None	This section requires a Compliance report to describe each deviation from an emission or operating limitation. The RICEs are neither subject to emission limitations, nor operating limitations. As

Rule Section	Cond.	Discussion
		demonstrated above, there are no emission limitations applicable to the RICEs. However, what is not readily apparent is whether the frequencies of oil changes and inspections are "operating limitations". Neither Subpart ZZZZ nor Subpart A defines "operating limitations". However, an understanding of what operating limitations are may be determined from the use of these terms in Subpart ZZZZ. In particular, the operating limitations for various types of RICE are specified in Tables 1b and 2b of the subpart. In these tables, operating limitations are acceptable ranges or limits for parameters such as (i) pressure drop across a catalyst; (ii) exhaust and catalyst inlet temperatures; and (iii) any operating limitations approved by the Administrator. Thus, operating limitations are parameters and their acceptable ranges for the operation of the RICE. Therefore, frequencies of oil changes and inspections of the air cleaner, hoses, and belts are not "operating limitations", and so this rule requirement is **non-applicable**.
§63.6650(e) *Report submittal*	None	This requirement is **non-applicable** since there are no applicable emission or operating limitations, and further, the permittee does not use a CMS to ensure compliance.
§63.6650(f) *Report submittal*	8.5.2.	This section requires the permittee to report all deviations as defined in this subpart in the semiannual monitoring report required by 40 C.F.R. §70.6(a)(3)(iii)(A) or 40 C.F.R. §71.6(a)(3)(iii)(A), which is condition 3.5.6. Since it would be possible to have a deviation (as the term is defined in §63.6675), this requirement is applicable. The compliance report language of the section is removed, however, since this report is non-applicable.
§63.6650(f) *Report submittal*	None	This requirement is **non-applicable** since none of the RICEs are new or reconstructed stationary RICE which fires landfill gas or digester gas.
§63.6655(a) *Records*	None	This requirement is **non-applicable** since there are no applicable emission and operating limitations.
§63.6655(b) *Records*	None	This requirement is **non-applicable** since there are CEMS or CPMS employed for the RICEs.
§63.6655(c) *Records*	None	This requirement is **non-applicable** since none of the RICEs are new or reconstructed stationary RICE which fires landfill gas or digester gas.
§63.6655(d) *Records*	None	This requirement is **non-applicable** since there are no applicable emission and operating limitations. Even though Row 9 of Table 6 is applicable (condition 8.1.6.), it is not an emission or operating limitation.
§63.6655(e) *Records*	8.4.1.	§63.6655(e)(3) is not included in the condition since it pertains to RICE located at an area source (the permittee's facility is a major source of HAP).
§63.6655(f) *Records*	8.4.2.	Since §63.6655(f)(2) does not apply, the language from §63.6655(f) and §63.6655(f)(1) were combined to form one paragraph for the permit condition.
§§63.6660(a)-(c) *Records*	8.4.3.	Inserted into the permit.

III. **45CSR42 – *Greenhouse Gas Emissions Inventory Program*.** This rule applies to all facilities whose greenhouse gas emissions exceed the *de minimis* amount on an annual basis given at 45CSR§42-3.1., and which are required to report emissions of regulated air pollutants pursuant to W.Va. Code §22-5-4(a)(14). The permittee is required to report emissions pursuant to this section of W. Va. Code since it is cited for current permit condition 3.1.15. The permittee's facility is subject to reporting of greenhouse gases emitted above the *de minimis* amount in the years specified by the Secretary. Refer to permit conditions 3.1.22. and 3.5.15.

IV. **Miscellaneous Changes**

a. The citation of authority for condition 3.1.3. has been updated to match current accepted "boilerplate".

b. The language for condition 3.1.5. has been updated.

c. Current permit condition 4.1.5. is a reporting requirement, and therefore it is more appropriate to place it in permit subsection 4.5. Refer to permit condition 4.5.1. This affected, and therefore necessitated a change, to the numbering of subsequent conditions and references to them in the permit (*i.e.*, 4.4.2. 4.4.3.). Also, reference to 4.1.5.a. within this relocated reporting requirement was changed to 4.5.1.a.

d. Current permit condition 7.2.1. in the first paragraph specifies multiple emission units that are subject to the permit condition. This listing of emission units was most likely added using the authority of 45CSR§30-5.1.c. The substantial requirement is specified in the second paragraph, which is from permit R13-2261A, condition A.3., which only applies to 8960 and 8970. Finally, the emission units specified with the citation of authority serves to limit the applicability of the condition to 8960 and 8970. This writer asked the permittee for its understanding of the condition's applicability. In technical correspondence[1] the permittee stated "There is no question from our point of view that the requirement applies to all pneumatic systems listed in this Condition although one could read the requirement as you indicate to only apply to 8960 and 8970. We have no objection to simply removing the reference to those systems from authority citation." Since the intent of the condition is to apply to all of the emission units listed, and the permittee understands and applies the condition in this way, the language "***(Screen Fines Pneumatic Transfer System-8960, and Screening Building Dedust System-8970)***" will be removed after the citation of authority in the renewal permit.

e. The language regarding the record retention period of no less than five (5) years has been removed from conditions 3.2.1., 3.4.4., 7.2.2., and 7.2.3. since it is redundant with condition 3.4.2.

V. **112(j) Boiler MACT Permit Language**. In permit condition 3.1.18 the date for a final rule has been changed from December 16, 2010 to January 16, 2011 in order to reflect the extension.

VI. **40 C.F.R. 60 Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units***. The Auxiliary Thermal Oil Heater (Em. Unit ID: 3600) is an affected facility under this subpart; however, because it combusts natural gas it is neither subject to the sulfur dioxide standard (§60.42c) nor the particulate matter standard (§60.43c). The only applicable requirement is 40 C.F.R. §60.48c(g)(1), which states:

> Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

Since the Auxiliary Thermal Oil Heater (3600) combusts only natural gas, the permittee may comply with the alternative recordkeeping of the amount of fuel combusted during each calendar month (40 C.F.R. §60.48c(g)(2)). This alternative's citation has been included in the final permit.

[1] October 12, 2010 email to this writer from Mr. Cliff Bowling, Sr. Environmental Engineer for Georgia-Pacific LLC.

Recordkeeping condition 4.4.2. is used to demonstrate compliance with the PM and SO_2 mass rate limits in conditions 4.1.2. and 4.1.5., respectively. Both of the limits are measured in units of pounds per hour. It is appropriate that the frequency of monitoring and recordkeeping be designed for the units of measure in which the limit is expressed. Therefore, the lower-case roman numerals specifying the (i) volume of fuel, and (ii) hours of operation are added based on the authority of 45CSR§30-5.1.c. in order to tailor this recordkeeping to the corresponding limits. 45CSR16 also has been cited for this condition since this NSPS requirement has been added.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

I. **40 C.F.R. 60 Subpart IIII—*Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*.** This rule does not apply to the compression ignition RICE-1 since it was constructed before July 11, 2005 (cf. applicability criteria at §60.4200(a)(2)). The rule does not apply to any of the RICE-2 through RICE-8 since they are spark ignition type.

II. **40 C.F.R. 60 Subpart JJJJ—*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*.** This rule does not apply to any of the RICE-2 through RICE-8 since they were constructed prior to all of the dates specified in §§60.4230(a)(1) through (5). The rule does not apply to RICE-1 since it is compression ignition type.

III. **Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.** The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

IV. **40 C.F.R. Part 64—*Compliance Assurance Monitoring (CAM)*.** This rule has been applied to permitted sources and incorporated into Title V permit R30-01900034-2006 (SM01) during its term. Therefore no further application of this rule is required for permitted source at this renewal. Further, based on information provided in the renewal application, this rule does not apply to the sources listed in the table below.

Blenders (Em. Unit ID# 6000). This rule does not apply to this source since it does not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the source becomes subject to a pollutant limitation in the future, or be required to use a control device, the potential emissions of regulated air pollutants emitted from the source are less than 100 tons per year. The potential emissions of the HAP methanol is greater than 10-tpy, making it a major source of HAP. However, since there is no emission limit for this pollutant at the time of this renewal, the criterion at §64.2(a)(1) is not met for Methanol. Therefore, the Blenders are not subject to CAM.
Log Deicing/Conditioning (fugitive). This rule does not apply to this source since it does not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the source(s) become subject to a pollutant limitation in the future, or may be required to use a control device or method, the potential emissions of regulated air pollutants emitted from the source are less than 100 tons per year. Also, the potential emissions of each HAP and aggregate HAPs are less than 10-tpy and 25-tpy, respectively. Therefore, the Log Deicing/Conditioning source is not subject to CAM.
Miscellaneous Coating Operations under PCWP MACT (fugitive). This rule does not apply to these sources since they do not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal.
Emergency Use Reciprocating Internal Combustion Engines (Em. Unit ID# RICE-1 through RICE-8). This rule does not apply to any of the RICE-1 through RICE-8 since none of them meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of

renewal. Even if the source(s) become subject to a pollutant limitation in the future, or may be required to use a control device, the potential emissions of regulated air pollutants emitted from these sources are less than 100 tons per year. Therefore, RICE-1 through RICE-8 are not subject to CAM. Since the RICEs are subject to 40 C.F.R. 63 Subpart ZZZZ, the exemption at §64.2(b)(1)(i) is met for HAPs emitted from the RICEs.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: January 3, 2011
Ending Date: February 2, 2011

All written comments should be addressed to the following individual and office:

Denton B. McDerment, P.E.
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

U.S. EPA Comments

No comments were received from U.S. EPA during the first proposed period (i.e., December 30, 2010, to February 17, 2011). Since changes will be made in the final permit based upon the permittee's comments (see below) on the draft permit, DAQ resubmitted the revised permit to U.S. EPA for a second proposed period, which began on March 10, 2011. On April 11, 2011, Mr. Mike Gordon (U.S. EPA) submitted the following comments via electronic mail.

Comment No. 1
Condition 3.7.2.b.
Permit shield from applicability to 40CFR63 subpart JJ says the facility is not a major source as defined in §63.2 (25/10tpy). From the fact sheet facility has HAP PTE of 125 TPY, which would make it a major source for HAPs. I don't think this affects the applicability of the subpart, though.

Response to Comment No. 1
Condition 3.7.2.b. will be revised in the final permit. The proposed permit read:

> Georgia-Pacific's Mt. Hope Facility is not engaged in the manufacture of wood furniture or wood furniture components and the facility is not a major source as defined in 40 C.F.R §63.2.

The final permit will read:

> Georgia-Pacific's Mt. Hope Facility is not engaged in the manufacture of wood furniture or wood furniture components. Since the facility does not meet the applicability criteria in 40 C.F.R. §63.800(a), this regulation does not apply.

Comment No. 2
4.1.6.
Condition states that heaters are to be used for auxiliary purposes only. I'm not sure what this condition was intended to do. If it was meant to limit PTE, then enforceable limits should be added, but the way it is written it is not practically enforceable, since "normal operation" is not defined and open to interpretation.

Response to Comment No. 2
If "normal operation" can be defined and included in the permit, then this condition would be practically enforceable.

According to the renewal application, the Auxiliary Thermal Oil Heater is used to keep the thermal oil at the required temperature during periods when the Wellons Energy System is down. Comparing this fact with permit condition 4.1.6., the Auxiliary Thermal Oil Heater may be operated only when the Wellons is non-operational. This is what is meant by "auxiliary purposes only" in the first statement of permit condition 4.1.6. In other words, the Auxiliary Thermal Oil Heater serves only as a back-up source of heat. The last statement of permit condition 4.1.6. prohibits the permittee from combusting fuel in the natural gas-fired Auxiliary Thermal Oil Heater during normal operating conditions of the Wellons. Even though the Wellons itself is capable of combusting natural gas, the last statement of permit condition 4.1.6. applies to the Auxiliary Thermal Oil Heater since this is a requirement specifically for the Auxiliary Thermal Oil Heater. Comparing the last statement of permit condition 4.1.6. with the application, "normal operating conditions" must mean periods when the Wellons Energy System is operating.

To demonstrate compliance with this requirement, the permittee must perform recordkeeping in permit condition 4.4.3. This condition points to operating permit Attachment D, which is a sample form used to record wood fuels and natural gas consumed by the Wellons Energy System. This sample form is also used to record the periods when the Auxiliary Thermal Oil Heater is operating (and the Wellons Energy System is simultaneously non-operational), and the volume of natural gas consumed during those periods.

Compliance with condition 4.1.6. is demonstrated by recording the times and fuel amounts when the Auxiliary Thermal Oil Heater is operating and the Wellons Energy System is non-operational.

Comment No. 3
5.1.5. and 6.1.3. – VOCs as Carbon
I did some research to find our policy on using VOC as carbon in method 25 and 25A. Here is a memo outlining EPA's position:

http://www.epa.gov/region07/air/title5/t5memos/19971121.pdf

Just to summarize, using VOC as carbon can be used to determine control efficiency, but not a mass based emissions rate, since it is not a one-to-one comparison. The memo outlines ways to convert method 25 and 25a tests to mass flow rates. I THINK this can be an easy fix, using manufacturers data on VOC composition to get a weighted VOC to carbon ratio and volumetric flowrate to get lb/hr, but let me know your thoughts. I will be in all week.

Response to Comment No. 3
On June 6, 2011, DAQ received a letter from U.S. EPA dated June 1, 2011, regarding the use of VOCs as carbon to demonstrate compliance with VOC pound per hour limits for the Wellons Energy System and Board Press (permit conditions 5.1.5. and 6.1.3., respectively). To summarize the letter, EPA has allowed the permit to remain unchanged. However, any future applicability determinations that are based on quantifying VOC emissions on a mass basis must use current EPA policy. As to this date, that policy is to use the "Wood Products Protocol 1 VOC" (WPP1 VOC) method, which includes the use of VOC as *propane*.

Public Comments
On February 1, 2011, this writer received an email from Mr. Kim Casto, Environmental Manager for Georgia-Pacific Wood Products LLC (*i.e.*, the permittee). The email transmitted the company's comments regarding the draft permit and fact sheet, which are transcribed below. The permittee subsequently sent a hard copy of the comments to this writer. The comments were certified by the responsible official.

Draft Fact Sheet Comments

Comment No. 1
In regards to the Compliance Plan Table A, some clarification seems appropriate. In reference to emissions from the blending operation, this emission source (and its associated emissions) was included in Section 3.8 of the Title V permit application submitted September 1, 2005. The blending operation has always been present at the facility and was an operation identified in the original construction permit application submitted for the facility. However, it was not recognized as an emission source at that time. When emission factors became available, the facility included the updated emissions in the next Title V application submitted for the facility with the thought that since the source was already operating, that was the appropriate avenue for including them in the operating permit.

A similar comment can be made about the log deicing system as an emission source. The 2008 National Council for Air and Stream Improvement (NCASI) Plywood database published emission factors for VOC, methanol, and acetaldehyde for log soaking vats used in plywood operations which we have applied to our log deicing system and presented in this permit application. Although, the deicing system (spraying heated water over logs) is not directly comparable to log soaking vats (where logs are submerged in heated water), we included emission estimates for deicing in this renewal application given that a similar operation (log soaking vats) is now recognized as an emission source. Again, since this operation has always been at the facility we thought the appropriate avenue for including the emissions was in the operating permit.

Relative to the Miscellaneous Coating Operations covered by the Plywood and Composite Wood Products (PCWP) Maximum Achievable Control Technology (MACT), this emission source was addressed in both the significant modification to the Title V permit issued on December 16, 2009 (conditions 3.1.19, 3.1.20, 3.4.7, 3.4.8, 3.5.11, 3.5.12, 3.5.13, 7.1.5, and 7.3.2) and the R13 Permit R13-1622H issued on December 14, 2009 (Condition 4.1.12). Furthermore, absent the requirement to use non-HAP coatings under the

PCWP MACT, these sources would not have been required to obtain a construction permit since the emissions are less than 45CSR13-2.17(a). As such, this activity should not be included in the compliance plan.

Relative to the RICE units, absent the requirements of Subpart ZZZZ, and recognizing the fact that these units are "designed and operated only in emergency situations", the potential to emit (according to an EPA guidance document dated September 6, 1995 (copy attached)) was calculated using 500 hours per year as a default operating time. This memo also concludes that a requirement to accept restrictions in a permit to limit the PTE for these type sources is not necessary. Therefore, it is our understanding that these RICE units would not have been required to obtain a construction permit since the emissions are less than 45CSR13-2.17(a). As such, this activity should not be included in the compliance plan.

We request that the Fact Sheet be updated and adjusted to include the information above and the full chronology of events concerning emission factors for these sources.

Response to Comment No. 1

With regard to the first paragraph concerning the blending operation, no change will be made to either the draft fact sheet or permit. The permittee's suggested chronology submitted in the comment is sufficient documentation.

With regard to the second paragraph concerning the log deicing system, no change will be made to either the draft fact sheet or permit. The permittee's suggested chronology submitted in the comment is sufficient documentation.

With regard to the third paragraph concerning the Miscellaneous Coating Operations, this source will be removed from the Compliance Plan since its particulate matter emissions are less than thresholds in 45CSR§13-2.17(a).

With regard to the fourth paragraph concerning the RICE units, only RICE-2 through RICE-8 will be removed from the Compliance Plan since their individual emissions do not meet the modification criteria in 45CSR§13-2.17(a). RICE-1 will not be removed from the Compliance Plan for the following reasons. According to technical correspondence[1], RICE-1 is a diesel engine that is directly coupled to a pump and there is no generator or electric motor involved with RICE-1 and the firewater pump. The U.S. EPA memorandum dated September 6, 1995, is guidance that pertains only to emergency electrical generators. This is readily determined from several statements in the memorandum:

> First page, first paragraph: "The purpose of this guidance is to address the determination of PTE for emergency electrical generators."
>
> Second page, last paragraph: "For purposes of today's guidance, an "emergency generator" means a generator whose sole function is to provide back-up power when electric power from the local utility is interrupted."
>
> Third page, last paragraph: "Today's guidance is only meant to address emergency generators as described."

Since an emergency generator (for purposes of the memorandum) provides back-up power when local utility power is interrupted, and it is physically impossible for RICE-1 to generate back-up electrical power, the U.S. EPA memorandum dated September 6, 1995, cannot be applied to RICE-1. Therefore, an operating time of 500 hr/yr can neither be assumed nor employed to calculate the PTE for RICE-1 based upon the memorandum.

[1] February 28, 2011 email to this writer from Mr. Kim Casto, Environmental Manager for the permittee.

With regard to the request stated in the fifth paragraph, the permittee's suggested chronology submitted in the comment is sufficient documentation and no further revision of this fact sheet is warranted.

Comment No. 2

Part II of the fact sheet documents the applicable requirements of 40 CFR 63, Subpart ZZZZ to the RICE units at Mt. Hope. However, there are a couple of changes that need to be made.

a. The only applicable compliance date included in the fact sheet is that for Compression Ignition (CI) RICE which is May 3, 2013. However, that date is only applicable to RICE-1. RICE 2-8 are spark ignition (SI) RICE which have an applicable compliance date of October 19, 2013.

b. The notifications identified as being required pursuant to §63.6645(a) (initial notification pursuant to §63.9(b)(2) and notification of compliance status pursuant to §63.9(h)) are not applicable to existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.

As such, please revise Part II to reflect these changes.

Response to Comment No. 2

Response to comment "a." – This oversight has been corrected in the fact sheet discussion of MACT Subpart ZZZZ and permit. In particular, the compliance date for RICE-2 through RICE-8 has been added by creating new condition 8.1.1.2. The rule language "or an existing stationary SI RICE located at an area source of HAP emissions," has not been included in condition 8.1.1.2. since the facility is not an area source. The contents of draft condition 8.1.1. have been assigned to a new condition number 8.1.1.1. in the final permit only for the convenience of keeping the compliance date requirements together in one condition 8.1.1.

Response to comment "b." – 40 C.F.R. §63.6645(a)(5) of the August 10, 2010 final rule does exclude RICE-1 through RICE-8 from the notifications under §63.6645(a) since these RICE meet one or more of the criteria to qualify for the exemption. This oversight will be corrected in Table B in the body of this fact sheet (see above), which provides discussion regarding 40 C.F.R. 63 Subpart ZZZZ.

Comment No. 3

Part VI of the fact sheet discusses the New Source Performance Standard (NSPS) requirements applicable to the Auxiliary Thermal Oil Heater and proposes some changes to the existing permit requirements that we believe are not necessary to assure continuous compliance. The proposed changes are to require daily fuel usage records and also to require records of operating hours. The NSPS (pursuant to §60.48c(g)(2)) allows an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. The NSPS standards are also designed to ensure "continuous" compliance with the emission standards. As such, we don't think daily fuel usage records or operating hours are required to assure continuous compliance given that this source combusts only natural gas. Therefore, we request that the fact sheet be changed to reflect maintaining only monthly fuel usage records.

Response to Comment No. 3

Since the Auxiliary Thermal Oil Heater (3600) combusts only natural gas, the permittee may comply with the alternative recordkeeping of the amount of fuel combusted during each calendar month. The discussion in Part VI of the fact sheet will be revised to account for this alternative. Permit condition 4.4.2.b. will be revised to a calendar month frequency, and the citation of authority will be changed from §60.48c(g)(1) to §60.48c(g)(2).

Recordkeeping condition 4.4.2. is used to demonstrate compliance with the PM and SO_2 mass rate limits in conditions 4.1.2. and 4.1.5., respectively. Both of the limits are measured in units of pounds per hour. It is

appropriate that the frequency of monitoring and recordkeeping be designed for the units of measure in which the limit is expressed. Therefore, the requirements of 4.4.2.b.i. and ii. are written in the permit.

Draft Title V Permit Comments

Comment No. 1
Please include the Wellons Energy System and the urea injection system in the Control Equipment table in Section 1.1 of the permit. These units serve as control devices for emissions from the facility.

Response to Comment No. 1
According to application Attachment E, the Wellons Energy System (WES-1) acts as a control device for pollutants generated in the drying process (*i.e.*, PM, VOC, and HAPs). The WES-1 is equipped with the Nalco Fuel Tech $NO_xOUT^{®}$ system (UI-1) in which urea is injected into the furnace at specified locations to control NO_x generation. Both the WES-1 and UI-1 will be added to the control device listing in subsection 1.1. with a note clarifying the fact that even though the WES-1 may be considered a control device, this may not be construed to mean that WES-1 is not subject to any other rule or regulation that may apply, or become applicable, to WES-1.

Comment No. 2
The emissions from the blenders are considered fugitive emissions since they are not exhausted via a stack and emanate from fugitive sources (such as seals) on blender drum. Although the blenders were assigned an Emission Unit ID (6000), the emissions are fugitive. As such please identify the emissions as fugitive in the compliance plan table in Section 1.1 and elsewhere in the permit. Condition 7.2.3 requires a weekly Method 22 test for the blender emissions. The emissions from the blenders are primarily VOC emissions with some PM emissions. We do not know where a Method 22 observation would be made, as we believe the emissions from the blenders should be considered a fugitive/area source. We believe that a more useful limit for the blenders is a resin consumption limit, which is already contained in the permit.

Response to Comment No. 2
The request to identify the emissions as fugitive in the compliance plan table in Section 1.1 and elsewhere in the permit is inconsistent with information submitted in the renewal application. Emissions from Log Deicing and Miscellaneous Coatings were identified as fugitive in application Attachment D, but the Blenders were not so identified. The Blenders were identified as a point source (6000). According to application Attachment E for the Blenders, the source is subject to a 32.7 lb/hr PM limit from 45CSR§7-4.1. Attachment E further states that current permit condition 7.2.3. is the MRR to demonstrate compliance with this limit. Condition 7.2.3. requires at least weekly visible emissions testing for the Bark Hog (2230), the Log Debarkers (1050), and the Log Flakers (2000). Additionally, in technical correspondence[1] answering this writer's questions regarding the Blender PM limit and its compliance demonstration in condition 7.2.3., the permittee stated "Given that the Blenders are subject to 45CSR7 as are the equipment listed and that is the compliance demonstration method for that equipment, it seemed appropriate to state that should also be the compliance demonstration method for the Blenders as well." For these reasons, the Blenders were added to condition 7.2.3.

Compliance with the resin consumption limit for the Board Press (7890) is not an appropriate method for determining compliance with the applicable PM limit for the Blender (6000) for at least two reasons:

1. The resin consumption limits are 772 tons per month and 9,264 tons per year (condition 6.1.5.), while the applicable PM limit is 32.7 pounds per hour. Demonstration of compliance with monthly and annual rate limits is not appropriate for pound per hour limits.

[1] September 16, 2010 email to this writer from Mr. Kim Casto, Environmental Manager for the permittee.

2. The PM limit is not calculated based upon the rate of resin consumption. The PM limit is based upon facility OSB production, which is 46.5 OD tons/hr. While resin consumption may be proportional to facility OSB production, the fact remains that the applicable limit is not based on resin consumption; therefore, monitoring/recordkeeping of resin consumption is not appropriate to demonstrate compliance with the PM limit.

In summary, no changes will be made to the fact sheet or permit based upon this comment.

Comment No. 3
The formatting of Condition 2.18.2 needs to be corrected. This condition is offset when compared to format of Condition 2.18.1.

Response to Comment No. 3
The requested change has been made.

Comment No. 4
Condition 3.1.18 includes a reference to the date of the final order of the US District Court of January 16, 2011. The date has since been revised by the US District Court and could be subject to subsequent revisions. This date doesn't appear to be a necessary part of the condition and should be deleted. The condition conveys the required action without reference to a date which is subject to being revised.

Response to Comment No. 4
January 16, 2011, was the then-current deadline when the draft permit was noticed. On January 20, 2011, the U.S. District Court for the District of Columbia denied U.S. EPA's motion to extend the deadline to issue the final rule and ordered that the rule be finalized by February 21, 2011. On February 21, 2011, EPA signed final rules for Major HAP source & Area HAP source industrial, commercial, and institutional boilers and process heaters. Based upon this final rule, DAQ has developed new language to replace the 112(j) placeholder language used in the draft permit. The new language has been set forth in the final permit as conditions 3.1.18.a. and 3.1.18.b.

Comment No. 5
Condition 3.2.3. has 5 sub-requirements (a), (b), (c), (d), and (f). Is there supposed to be an (e) or is the numbering sequence incorrect. If the latter, please revise so the sequence is in order to prevent potential confusion.

Response to Comment No. 5
The numbering sequence in the draft permit is correct since it is based upon applicable requirements 40 C.F.R. §§63.2270(a), (b), (c), (d) and (f). No change will be made to condition 3.2.3. based upon this comment.

Comment No. 6
For the reasons contained in the comments on the fact sheet presented above, we request that Condition 4.4.2. be changed to revert back to the same condition in the existing Title V permit dated December 16, 2009.

Response to Comment No. 6
Final permit condition 4.4.2.b. will be revised to a calendar month frequency, and the citation of authority will be changed from §60.48c(g)(1) to §60.48c(g)(2). Draft conditions 4.4.2.b.i. and ii. will be retained for the reasons discussed above in the Response to Comment No. 3 on the draft fact sheet. With these changes, the request to revert back to the same condition in the existing Title V permit dated December 16, 2009, cannot be granted in this final permitting action.

Comment No. 7
Condition 5.1.3 uses the terminology of wood "waste" to describe the primary fuel of the Wellons Energy System. The material being combusted at the facility is not a "waste" but "residuals" generated in the manufacturing process that can be beneficially used either as a fuel or for other useful purposes. As such please replace the term "waste" with "residuals".

Response to Comment No. 7
The entire condition is an applicable requirement in Permit No. R13-1622H (condition 4.1.5.) which cannot be altered using Title V permitting procedures. The permittee must have the underlying permit revised, and then the Title V permit condition may be revised. No change will be made in the final permit based upon this comment.

Comment No. 8
Condition 5.1.5 also uses the term "waste" which should be changed to "residuals". In addition, this condition lists the emission limits for various pollutants emitted by the process. Given that the current limits for PM have been based on results obtained from Method 5 performance tests (filterable fraction only) and the subsequent need to include condensable PM in future activities (and which were included in the permit application), we believe the limits in the permit should note that the PM limit is filterable fraction only. Another option would be to include emission limits for each fraction as contained in the permit application. A similar comment is made relative to the VOC emission limit. Compliance with the limit has been based on test results obtained using EPA Method 25A with the results express on an as carbon basis. As such, we request that VOC limit be written as VOC (as carbon) as it is done in Condition 6.1.3.

Response to Comment No. 8
Condition 5.3.2. specifies EPA Method 5 for determining compliance with the PM limit in condition 5.1.5. Since Method 5 pertains to filterable fraction only, the language "(filterable fraction only)" has been added after PM in condition 5.1.5.

The VOC limit be written as "VOC (as carbon)" in condition 5.1.5. as requested, since U.S. EPA is allowing this limit to remain "as carbon" and not be changed to "as propane". See U.S. EPA Comment No. 3 (above).

With regard to the requested change of "waste" to "residuals", refer to the rationale in the Response to Comment No. 7.

Comment No. 9
We believe that Condition 5.2.2 needs to exempt periods of startup and shutdown for the Wellons. The Wellons is "operating" during periods of startup and shutdown, but the temperature ranges in 5.2.2.1.a cannot be maintained, simply because the unit is starting up or shutting down. A "hot" startup will generally have a 12-hour average that is below 1300 degrees and a "cold" startup will often be several 12-hour periods. We presently submit "Temperature Excursions" with compliance reports as a result of these situations.

Response to Comment No. 9
The requested change to exempt periods of startup and shutdown constitutes a significant change in existing monitoring permit terms; therefore, the change cannot be made as part of this final permitting action.

Comment No. 10

We believe that Condition 5.2.3 is irrelevant given requirements of the PCWP MACT. The minimum firebox temperature is 1300 degrees on a 3-hour average. We still use 1400 degrees as a point at which operators begin their response to temperature swings in the burner (i.e. when the temperature drops below 1400 a countdown timer activates which allows 15 minutes to correct the temperature excursion or the dryers begin coming down). We believe that this Condition may be carry-over from the pre-MACT days when it was assumed that 1400 degrees provided adequate VOC destruction. We request that this Condition be eliminated from the permit.

Response to Comment No. 10

Condition 5.2.3. is based entirely upon the permittee's CAM Plan, which does not apply to emission limits that are subject to "Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act" (*cf.* 40 C.F.R. §64.2(b)(1)(i)). Thus, CAM does not apply to emission limitations from the PCWP MACT. However, CAM applies to another pollutant, even though the same monitoring parameters are used to demonstrate compliance for both pollutant limits. Simply because there is overlap or redundancy (regardless of rule effective dates) does not mean CAM is non-applicable, or that CAM permit terms may be eliminated. This is due to the fact that CAM applies to a pollutant-specific emissions unit (*cf.* 40 C.F.R. §§64.1 and 64.2(a)) that meets all CAM applicability criteria and none of the exemptions.

The final fact sheet for the previous permit renewal R30-01900034-2006, as well as review of the limits from Permit No. R13-1622H (condition 4.1.1.) indicate that the Wellons Energy System is subject to CAM since (1) it is subject to a VOC limit of 3.00 lb/hr; (2) The Wellons is a control device used to achieve compliance with the emission limitation; and (3) the Wellons has potential pre-control device emissions of VOC that are 131 tons/year (which is greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source); and meets none of the exemptions in 40 C.F.R. §64.2(b) for VOC.

The final fact sheet for the previous permit renewal R30-01900034-2006 specified that CAM applied to emissions of formaldehyde as well. While the PCWP MACT does set emission limitations for formaldehyde (*cf.* final permit condition 5.1.8.), it does not set limitations and standards for VOCs. Since the Wellons meets all of the CAM applicability criteria for VOCs, CAM applies to emissions of VOCs from the pollutant-specific emissions unit Wellons Energy System. Any overlap in monitoring requirements is not justification for dismissing the CAM requirements that may have been prior to PCWP MACT requirements.

No change will be made in the final permit based upon this comment.

Comment No. 11

Condition 5.3.2 list various test methods to be used when conducting a performance test. The test methods contained in the table are not inclusive of all the EPA approved test methods for measuring the pollutant. For example, NOx lists Methods 7, 7A, 7B, 7C, or 7D but not Method 7E which is the predominant method used since it is an instrumental method. However, to use this method, approval from the Director would have to be obtained prior to its use which we don't believe is the intent of this condition. As such, we request this condition be revised to remove the table and simply state that any EPA approved test method for that pollutant may be used when conducting performance tests.

Response to Comment No. 11

The entire condition is an applicable requirement in Permit No. R13-1622H (condition 4.2.2.) which cannot be changed using Title V permitting procedures. The permittee must have the underlying permit revised, and then the Title V permit condition may be revised. If the requested change were made in the final Title V permit, it would contradict the NSR permit requirement to obtain approval as required by the last statement of the condition. No change will be made in the final permit based upon this comment.

Comment No. 12
Condition 6.1. lists the emission limits for various pollutants emitted by the process. Given that the current limits for PM have been based on results obtained from Method 5 performance tests (filterable fraction only) and the subsequent need to include condensable PM in future activities (and which were included in the permit application), we believe the limits in the permit should note that the PM limit is filterable fraction only. Another option would be to include emission limits for each fraction as contained in the permit application.

Response to Comment No. 12
Since there is only a subsection 6.1., the first sentence of the comment has been interpreted to refer to condition 6.1.3. for this response.

Condition 6.3.3. specifies EPA Method 5 for determining compliance with the PM limit in condition 6.1.3. Since Method 5 pertains to filterable fraction only, the language "(filterable fraction only)" has been added after PM in condition 6.1.3.

Comment No. 13
Condition 6.3.3. lists various test methods to be used when conducting a performance test. The test methods contained in the table are not inclusive of all the EPA approved test methods for measuring the pollutant. For example, NOx lists Methods 7, 7A, 7B, 7C, or 7D but not Method 7E which is the predominant method used since it is an instrumental method. However, to use this method, approval from the Director would have to be obtained prior to its use which we don't believe is the intent of this condition. As such, we request this condition be revised to remove the table and simply state that any EPA approved test method for that pollutant may be used when conducting performance tests.

Response to Comment No. 13
First, neither the pollutant NO_x, nor any of its associated test methods (*i.e.*, Method 7, 7A, 7B, 7C, or 7D) are listed in condition 6.3.3. Therefore, Method 7E will not be added to the table.

Second, the flexibility provided by replacing the table with the statement "any EPA approved test method for that pollutant may be used when conducting performance tests" would be a significant change to existing monitoring permit terms. The requested change will not be made in the final permit.

Comment No. 14
Condition 7.1.1. lists the PM emission limits for various emission sources. Given that the current limits for PM have been based on results obtained from Method 5 performance tests (filterable fraction only) and the subsequent need to include condensable PM in future activities, we believe the limits in the permit should note that the PM limit is filterable fraction only.

Response to Comment No. 14
It appears that the permit limitations are based upon different sources of information. For example, according to the application for permit R13-1622, the emission sources of Sections 6000, 7000, 8000, and 9000 "were estimated by multiplying an estimate of the particulate matter concentration in the control device exhaust by the exhaust gas volume. For systems with a bagfilter, an exhaust gas particulate matter concentration of 0.005 gr/ACF was used. This value was recommended for use by the baghouse vendor for a similar facility. Particulate matter emissions from the two (2) systems which will be equipped with high-efficiency cyclones were estimated by assuming an exhaust gas concentration of 0.01 gr/ACF. This value is based on results of emissions testing conducted at Georgia-Pacific Corporation's particleboard plant in Louisville, Mississippi and a plywood plant in Talladega, Alabama." Another source of information is the Engineering Evaluation for permit R13-2261A, which pertains to emission sources 8960 and 8970. The evaluation states that "Estimates for PM emissions are manufacturer-based values according to maximum design operating conditions."

Condition 7.1.1. specifies the allowable PM mass emission rate based upon 45CSR§7-4.1. *Compliance Test Procedures for 45CSR7* reads in 45CSR§7A-3.1.a., "Except as otherwise provided in section 3.1., stack testing to determine particulate mass emissions shall be performed using the methodology set forth in 40 CFR, Part 60, Appendix A, Methods 1 through 5, as published July 1, 1997…." Considering that the permit limitations streamline the less stringent 45CSR7 allowable emission rates, and Method 5 is required by 45CSR7A in order to demonstrate compliance with 45CSR7 limits, it is reasonable in this context that Method 5 would also be employed to determine compliance with the permit limitations of condition 7.1.1.

Considering that the entire condition pertains to particulate matter, a single parenthetical note has been added in the last sentence of final permit condition 7.1.1. to clarify that the limits are for filterable fraction only.

Comment No. 15
It is our understanding that based on the fact that baghouses are subject to an opacity limit under 45 CSR 7, according to Condition 3.2.1 weekly visual inspections are required. Condition 7.2.1 says only semi-monthly Method 22 is required. Please include clarifying language in the permit to address this apparent contradiction.

Response to Comment No. 15
While both conditions 3.2.1. and 7.2.1. require Method 22 tests at different frequencies, their purposes are to demonstrate compliance with two different types of limits.

Condition 3.2.1. requires **weekly** Method 22 tests for each emission point subject to an **opacity** limit, excluding the Wellons Energy System (5600) and Board Press (7890).

Condition 7.2.1. requires **semi-monthly** Method 22 tests for compliance with the **particulate matter mass rate emissions** limits established for the Former Area (6800), Mat Trim (6900), Finishing Area (8900), Sanding Area (9500), Screen Fines Pneumatic Transfer System (8960), and Screening Building Dedust System (8970).

Thus, the semi-monthly testing under condition 7.2.1. does not contradict or relax the weekly testing in condition 3.2.1. Further, the semi-monthly testing condition will be retained since it is a requirement in Permit No. R13-2261A (condition A.3.) to demonstrate compliance with the particulate matter mass rate limits.

Since the foregoing details are contained in each of the permit conditions, and this response highlights those details, no change is warranted in the final permit conditions.

Comment No. 16
Condition 8.1.1. references the compliance date for CI RICE but doesn't include the compliance date (October 19, 2013) for the SI RICE. Please revise this condition (or add another condition) to address the different compliance date for SI RICE.

Response to Comment No. 16
See the Response to Comment No. 2 above regarding the draft fact sheet.

Comment No. 17

As detailed in the comments on the Fact Sheet above, the initial notification requirements and the requirement to submit a notification of compliance status report are not applicable to the RICE units at the Mt. Hope facility. As such, Condition 8.5.2. should be deleted in its entirety.

Response to Comment No. 17

Draft permit condition 8.5.2. will be deleted in its entirety for the reasons discussed in the Response to Comment No. 2 above regarding the draft fact sheet. Draft condition 8.5.3. will be renumbered as 8.5.2. and references to 8.5.3. will be revised in Table B of this fact sheet, and in condition 8.5.1. of the permit.

No other public comments were received.

Other Changes

During the notice period, DAQ updated the Title V permit boilerplate with a new addition to section 3.3.1. Condition 3.3.1.d. was added along with a change in the citation of authority.